

# Exhibit 4

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8 *Class Counsel for Direct Purchaser Plaintiffs*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CAPACITORS ANTITRUST LITIGATION  
THIS DOCUMENT RELATES TO:  
ALL DIRECT PURCHASER ACTIONS

Master File No. 3:14-cv-03264-JD

**DECLARATION OF C. ANDREW  
DIRKSEN IN SUPPORT OF CLASS  
COUNSEL'S APPLICATION FOR  
ATTORNEYS' FEES AND  
REIMBURSEMENT  
OF EXPENSES SUBMITTED ON  
BEHALF OF CERA LLP**

I, C. Andrew Dirksen, declare and state as follows:

1. I am a member of CERA LLP ("the Firm"). I submit this Declaration in support of Class  
Counsel's interim application for attorneys' fees for services rendered to the class in the above-  
captioned litigation and for reimbursement of expenses reasonably incurred in the course of such  
representation. The time expended in preparing this Declaration is not included.

2. I have reviewed the Court's October 31, 2014 Order Appointing Interim Lead Class  
Counsel (Dkt. 319) ("Order"), including in particular the Order's provisions regarding fees, costs and  
expenses. The Firm has adhered to those provisions.

3. The Firm has acted as class counsel to Direct Purchaser Plaintiffs ("DPPs") in this class  
action. It represents named (proposed class representative) plaintiff Chip-Tech, Inc., which filed the  
first direct purchaser complaint in this action in July 2014. The Firm assisted lead counsel Joseph Saveri

1 Law Firm in the pre-filing investigation that led to the filing of Chip-Tech's complaint in July 2014.

2 During the course of this litigation, the Firm has been involved in the following activities on behalf of  
3 the DPPs at the request and under the direction of Lead Counsel:

- 4 • pre-filing investigative work, including work on the initial complaint; overall case  
5 management, and litigation strategy discussions;
- 6 • legal research and drafting in support of certain argument sections within DPPs'  
7 opposition to defendants' motions to dismiss;
- 8 • analysis of materials with respect to amending the complaint and related work on the  
9 consolidated amended complaint, translating it into Japanese, and serving it on defendants;
- 10 • drafting of discovery to defendants and assisting in the management and supervision of  
11 class and merits discovery efforts;
- 12 • "meet and confers" with counsel for nearly all defendants about ESI collection and  
13 production, interrogatory responses and objections, requests for document production and  
14 responsive records, and other discovery-related matters (global and defendant-specific);
- 15 • preparation for, and conducting of, depositions of 30(b)(6) and percipient witnesses of  
16 certain defendants;
- 17 • analysis and synthesis of records produced by certain defendants;
- 18 • work with client Chip-Tech, including research of the capacitors industry, responding to  
19 defendants' discovery directed to the named plaintiffs, and collection and organization of tens of  
20 thousands of pages of records responsive to Defendants' document requests;
- 21 • settlement negotiations and discussions with certain Defendants, and other work as  
22 requested by Lead Counsel for DPPs.

23 4. During the period from November 1, 2014 through September 30, 2016, the Firm  
24 performed 1,368.60 hours of work in connection with this litigation. Based upon the historical hourly  
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1 rates charged by the Firm, the lodestar value of the time is \$911,646.75. Attached hereto as Exhibit A is  
2 a chart which indicates the attorneys, paralegals and staff who worked on this litigation, the number of  
3 hours worked, the categories of their work and their respective lodestar values. Exhibit A was prepared  
4 from contemporaneous, daily time records regularly prepared and maintained by the Firm and which  
5 have been provided to Lead Counsel for review.

6 5. All of the services performed by the Firm in connection with this litigation were  
7 reasonably necessary in the prosecution of this case. There has been no unnecessary duplication of  
8 services for which the Firm now seeks compensation. The lodestar calculations exclude time spent  
9 reading or reviewing work prepared by others or other information relating to the case unless related to  
10 preparation for or work on a matter specifically assigned to the Firm by Lead Counsel. The rates at  
11 which the Firm seeks compensation are its usual and customary hourly rates charged for this work.

12 6. During the period from October 1, 2014 through September 30, 2016, the Firm incurred  
13 expenses in the sum of \$231,507.28. These expenses were reasonably and necessarily incurred in  
14 connection with this litigation and are summarized in the chart attached as Exhibit B. Expense  
15 documentation has been provided to Lead Counsel for review.

16 7. The expenses incurred are reflected on the books and records of the Firm. These books  
17 and records are prepared from checks and expense vouchers which are regularly kept and maintained  
18 by the Firm and accurately reflect the expenses incurred.

19 8. The Firm's compensation for the services rendered on behalf of the class is wholly  
20 contingent. Any fees and reimbursement of expenses will be limited to such amounts as approved by  
21 this Court.

22 I hereby affirm under penalty of perjury of the laws of the United States that the foregoing is  
23 true and correct.

24 Dated: January 27, 2017

25 By: /s/C. Andrew Dirksen  
C. Andrew Dirksen

**Exhibit A****In re Capacitors Antitrust Litigation****CERA LLP****TIME REPORT****November 1, 2014 through September 30, 2016**

**Professional Status:** Partner    Of Counsel    Associate    Law Clerk    ParaLegal

ATTORNEYS	Professional Status	Hourly Rate	Factual Research & Investigations	Discovery of Plaintiffs	Discovery of Defendants/ Third Parties	Work with Experts	Pleading, Briefs & Pre-Trial Case Filings and Motions	Case Management & Case Planning	Court Appearance & Preparation	Settlement	Fee/Expense Proceedings	Cumulative Hours	Cumulative Lodesar
Solomon B. Cera	P	\$ 1,000.00	14.30	6.30	14.95		25.40	23.20	3.50	27.35		115.00	<b>\$103,315.00</b>
Charles A. Dirksen	P	\$ 725.00	0.40	154.30	832.70		60.10	10.10	2.70	1.10		1,061.40	<b>\$749,103.75</b>
Louis A. Kessler	A	\$ 475.00					59.80					59.80	<b>\$ 28,405.00</b>
Adrienne Lipoma	A	\$ 400.00						14.50				14.50	<b>\$ 5,800.00</b>
Adrienne Lipoma	A	\$ 385.00		7.80								7.80	<b>\$ 3,003.00</b>
<b>SUB-TOTAL</b>			<b>14.70</b>	<b>168.40</b>	<b>847.65</b>	<b>0.00</b>	<b>145.30</b>	<b>47.80</b>	<b>6.20</b>	<b>28.45</b>	<b>0.00</b>	<b>1,258.50</b>	<b>889,626.75</b>
NON-ATTORNEYS													
John R. Leibee	PL	\$ 200.00	0.40	12.70	52.40		30.70	13.90				110.10	<b>22,020.00</b>
<b>SUB-TOTAL</b>			<b>0.40</b>	<b>12.70</b>	<b>52.40</b>	<b>0.00</b>	<b>30.70</b>	<b>13.90</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>110.10</b>	<b>22,020.00</b>
<b>GRAND TOTAL:</b>			<b>15.10</b>	<b>181.10</b>	<b>900.05</b>	<b>0.00</b>	<b>176.00</b>	<b>61.70</b>	<b>6.20</b>	<b>28.45</b>	<b>0.00</b>	<b>\$1,368.60</b>	<b>\$911,646.75</b>

**Exhibit B**

**In re Capacitors Antitrust Litigation**

**CERA LLP**

**EXPENSE REPORT**

**October 1, 2014 through September 30, 2016**

Assessments	\$ 200,000.00
Commercial Copies/Internal Copies	\$ 4,019.25
Computer Research	\$ 2,835.16
Postage/Express Delivery	\$ 700.29
Service Fees	\$ 7,024.95
Telephone	\$ 1,924.43
Travel	<u>\$ 15,003.20</u>
<b>TOTAL</b>	<b>\$231,507.28</b>